

## TIME RECORDS AND EXPENSES

La Liberte v. Reid(October 2019 – November 5, 2019)October 201910/07/2019

|     |  |     |
|-----|--|-----|
| JLL | Receipt and review of order and decision granting d's anti-SLAPP motion and awarding attorneys' fees; OC and e-mail w/ J. Reichman re: same. | .50 |
| JHR | Review decision; email; TC JR  | .90 |

10/16/2019

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|-----|---|------|
| JHR | Review attorney's fees cases; research relevant controlling state law | 1.60 |
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10/17/2019

|     |   |      |
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| JLL | Legal research and review of NY/CA case law re: motion for award of attorneys' fees and costs; OC and e-mail w/ J. Reichman re: same. | .60  |
| JHR | Review Adelson; O/C JL re researching California law re attorney's fees   | 1.50 |

10/22/2019

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| JLL | Legal research and review of CA statutes and case law re: motions for and awards of attorneys' fees and costs under CA anti-SLAPP law; OC and e-mail w/ J. Reichman re: same. | 1.30 |
| JHR | Review CA cases re attorney's fees; o/c JL re research on rates   | 2.30 |

10/23/2019

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| JHR | Review of time records; review CA cases; draft brief | 2.50 |
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10/24/2019

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|-------------------|---|------|
| JLL               | Research and review of NY/CA cases re: anti-SLAPP motions and awards of attorneys' fees; further review of order / decisions; OC and e-mail w/ J. Reichman re: same.  | 1.80 |
| JHR               | Draft motion papers; email  | 2.20 |
| <u>10/25/2019</u> |   |      |
| JLL               | Continue research and review of NY/CA case law re: anti-SLAPP statutes and awards of attorneys' fees; draft spreadsheet tracking individual case awards / hourly rates; OC and e-mail w/ J. Reichman re: same; research Judge Irizarry decisions re: attorneys' fee awards. | 2.80 |
| JHR               | Email; review cases; prior awards   | 1.20 |
| <u>10/29/2019</u> |   |      |
| JLL               | Review of attorney declarations in support of motion for attorneys' fees; OC and e-mail w/ J. Reichman re: same; receipt and review of p's notice of appeal; e-mail w/ EDNY clerk re: same.   | 1.00 |
| JHR               | TC conf NBC; draft motion papers; review notice of appeal; email to JR  | 5.00 |
| <u>10/30/2019</u> |   |      |
| JLL               | Continue legal research and review of NY/CA case law re: attorney fee awards; receipt and review of notice of appeal and deadline to submit appellate record and related certification e-filed by p's counsel; OC and e-mail w/ J. Reichman re: same.                       | .50  |
| JHR               | Email; draft motion papers  | 2.00 |
| <u>10/31/2019</u> |   |      |
| JHR               | Draft motion papers re attorney's fees; email;  | 2.00 |
| <u>11/01/2019</u> |   |      |

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| JLL | Continue legal research and review of NY/CA cases and statutes re: lodestar method, use of attorney's award multipliers, local/regional forum rule, and relevant evidence to demonstrate reasonableness of fees; TC and e-mail w/ J. Reichman re: same. | 2.30 |
| JHR | Draft motion re attorney's fees; TC LA  | 2.70 |

11/04/2019

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| JLL | Receipt and review of D. Kummer affidavit (signed); e-mail w/ D. Kummer and J. Reichman re: same; OC w/ J. Reichman re: additional legal research on NY/CA attorney's fee cases re: "forum rule" and calculation of hourly rates; review of memo of law in support of motion for attorney's fees. | 1.20 |
| JHR | Draft motion papers   | 3.50 |

11/05/2019

|     |   |      |
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| JLL | Revise / finalize memo of law in support of motion for attorney's fees; continue legal research and review of NY/CA case law re: same; OC and e-mail w/ J. Reichman re: same. | 3.60 |
| JHR | Finalize papers   | 1.00 |

**Attorney Fee Summary (Oct. 2019 – Nov. 5, 2019)**

| <u>Timekeeper</u>                     | <u>Hours</u> | <u>Total</u>    |
|---------------------------------------|--------------|-----------------|
| John H. Reichman (\$650/hr)           | 28.4         | \$18,460        |
| Jason Libou (\$390/hr)                | 15.6         | \$6,084         |
| <b>Total Hours &amp; Fees:</b>        | <b>44.0</b>  | <b>\$24,544</b> |
| <b>Blended Hourly Rate - \$557.81</b> |              |                 |